



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

November 19, 2007

Reply To: ETPA-088

Ref: 07-054-AFS

Hans von Rekowski, IDT Leader
Sitka Ranger District, Tongass National Forest
204 Siginaka Way
Sitka, Alaska 99835

Dear Mr. von Rekowski:

The U.S. Environmental Protection Agency (EPA) has reviewed the Draft Environmental Impact Statement (EIS) (CEQ No. 20070406) for the Iyouktug Timber Sales project on the Hoonah Ranger District, Tongass National Forest, in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act. This Section specifically directs EPA to review and comment in writing on the environmental impacts associated with all major federal actions. Under our policy and procedures, we also review the adequacy of the draft document in meeting procedural and public disclosure requirements of NEPA.

The draft EIS proposes a no action and four action alternatives. Alternative 2 is the proposed action and Alternative 3 is the preferred alternative. According to the draft EIS, Alternative 2 maximizes timber harvest in the Iyouktug project area; Alternative 3 minimizes impacts to deer habitat, connectivity, and also minimizes effects to roadless characteristics in roadless areas while providing for economic timber supply; Alternative 4 minimizes impacts to the roadless character of Iyouktug's roadless areas; and Alternative 5 maximizes the economic return of timber harvest in the project area.

EPA has rated the draft EIS as EC-2 (Environmental Concerns-Insufficient Information) due to concerns regarding potential impacts to water quality and wetlands. We recommend that the final EIS include additional information about the affected resources and mitigation measures to avoid or compensate for impacts. An explanation of the EPA rating system is attached to this letter. The rating and a summary of our comments will be published in the Federal Register.

The draft EIS includes a good discussion of potential water quality impacts, including potential increased temperature due to harvest and potential increased sediment due to roads and stream crossings, such as the Middle Iyouktug and Suntaheen watersheds. However the document does not indicate whether any waters in the project area are listed on Alaska's 303(d) list or whether the project will contribute to exceedences of water quality standards. Section 303(d) of the Clean Water Act (CWA) requires identification of those water bodies which are not meeting or not likely to meet State water quality standards. The EIS should report those water bodies potentially affected by the project that are listed on the State's current 303(d) list and whether the Alaska Department of Environmental Conservation (ADEC) has developed a water quality restoration plan (Total Maximum Daily Load) for the waterbodies and the

pollutants of concern, if applicable. If a Total Maximum Daily Load (TMDL) has not been established for those water bodies on the 303(d) list, then in the interim until one is established, the EIS should demonstrate that there will be no net degradation of water quality to these listed waters. The DEIS discusses the potential for sediment loading, but not in terms of meeting or exceeding water quality standards. We recommend that the final EIS include such a discussion along with mitigation measures. We also recommend that the final EIS include a discussion about potential impacts of sediment on wetlands and associated mitigation measures.

EPA commends the US Forest Service (FS) for consulting with tribal governments and incorporating their concerns into the modifications of the alternatives. The draft EIS is well-written and informative. The maps, tables, and summary charts are helpful tools for comparing the alternatives.

Thank you for the opportunity to comment on this draft EIS. If you would like to discuss our response further, please contact Fatima Bukhari, at (907) 271-1481 or via electronic mail at bukhari.fatima@epa.gov or me at (206) 553- 1601.

Sincerely,

/s/

Christine Reichgott, Manager
NEPA Review Unit

Enclosures